

**In the Matter Of:**  
**ESTATE OF MEGAN LARRICK vs TUSCARAWAS**

5:21-cv-00959

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**TIMOTHY LARRICK**

*October 19, 2022*

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IN THE UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF OHIO  
EASTERN DIVISION

ESTATE OF MEGAN )  
LARRICK, etc., )  
Plaintiffs, )  
vs. ) JUDGE BARKER  
TUSCARAWAS ) CASE NO. 5:21-cv-00959  
COUNTY, et al., )  
Defendants. )

THE DEPOSITION OF TIMOTHY LARRICK  
WEDNESDAY, OCTOBER 19, 2022

The deposition of TIMOTHY  
LARRICK, called by the Plaintiff for  
examination pursuant to the Federal  
Rules of Civil Procedure, taken before  
me, the undersigned, Margaret A.  
Trombetta, Notary Public and RMR within  
and for the State of Ohio, taken at the  
offices of the Tuscarawas County  
Sheriff's Office, 2295 Reiser Avenue,  
S.E., New Philadelphia, Ohio,  
commencing at 10:00 a.m., the day and  
date above set forth.

1 APPEARANCES:

2 On behalf of the Plaintiff:

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7 On behalf of Defendants Tuscarawas  
8 County, Orvis Campbell, Daniel  
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DiGenova, Vonda Hamilton, and BrieAnna  
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15 Julie Scott, Cruz Fondriest, and John  
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1 TIMOTHY LARRICK

2 of lawful age, called by the Defendants  
3 for examination pursuant to the Federal  
4 Rules of Civil Procedure, having been  
5 first duly sworn, as hereinafter  
6 certified, was examined and testified  
7 as follows:

8 EXAMINATION OF TIMOTHY LARRICK

9 BY MR. LANG:

10 Q. Would you state your name for  
11 the record, please.

12 A. Timothy Lee Larrick, Sr.

13 Q. Mr. Larrick, I subpoenaed you  
14 to be here today and you received a  
15 subpoena with the witness fee, is that  
16 right?

17 A. Yes.

18 Q. A deposition is a  
19 question-and-answer period. The lawyers  
20 have the opportunity to ask you questions  
21 and you simply answer the questions,  
22 okay?

23 A. Uh-huh.

24 Q. If you don't understand a  
25 question, just say so.

1           A.       Okay.

2           Q.       Lawyers tend to ask weird  
3 questions sometimes. I know I've asked  
4 questions I don't even understand, so --

5                   MR. CLEARY: That's why I'm  
6 here.

7           Q.       -- that's why he is here to  
8 interpret, and I'm sure Ms. Bonham will  
9 call me out on one of those things if I  
10 don't make sense, so don't be bashful  
11 about that.

12                   If you can answer questions  
13 yes or no, answer them yes or no.  
14 Otherwise, I'm going to ask you to tell  
15 the truth and be complete in your  
16 answers.

17                   Mr. Cleary is going to have an  
18 opportunity to ask you questions and Ms.  
19 Bonham will have an opportunity to ask  
20 you questions. We'll try to get you out  
21 of here as quickly as we can, okay?

22           A.       Uh-huh.

23           Q.       When you answer, please answer  
24 out loud. Nods and shakes of the head,  
25 she can't take down, so answer verbally

1 out loud.

2 A. Yes, sir.

3 Q. And if you're to say yes or  
4 no, say yes or no instead of uh-huh and  
5 huh-huh because that doesn't come out too  
6 well when she types this up.

7 If the transcript of the  
8 written version of the  
9 question-and-answer period of this  
10 deposition is typed up, you are going to  
11 have an opportunity to read that and make  
12 corrections, okay?

13 A. Uh-huh.

14 Q. And the court reporter will  
15 notify you at the address you give here  
16 so that you can set up a meeting and do  
17 that, okay?

18 A. Yes, sir.

19 Q. Do you have any questions  
20 before we start?

21 A. Nope.

22 Q. Are you under the influence of  
23 any drugs or alcohol right now that might  
24 prevent you from answering questions?

25 A. No, sir.

1 Q. Do you have any hearing  
2 problems?

3 A. Slightly.

4 Q. If you don't hear me, I mean  
5 I've got hearing aids and sometimes I  
6 can't even hear with these, so if you  
7 can't hear me, just say so.

8 A. Uh-huh.

9 Q. If you miss a part of the  
10 question, say so, okay?

11 A. Yes.

12 Q. What's your residence address?

13 A. 512 Maple Street, Pleasant  
14 City, Ohio.

15 Q. And how long have you lived  
16 there?

17 A. About three months maybe, two,  
18 three months.

19 Q. And before that, where did you  
20 live?

21 A. 325 South 7th, Byesville,  
22 Ohio.

23 Q. And did you live with somebody  
24 at that address?

25 A. I lived with my mother in



1 Byesville, Ohio.

2 Q. What's her name?

3 A. Donna Strauss.

4 Q. Anybody else live in that  
5 house at the time?

6 A. No, sir.

7 Q. How long did you live there?

8 A. I lived there about 14 months.

9 Q. And before that, where did you  
10 live?

11 A. 230 North Second Street,  
12 Cambridge, Ohio.

13 Q. And that was your residence  
14 for a long time, wasn't it?

15 A. Yes, about 10 years.

16 Q. And did you live at that  
17 residence in Cambridge with anybody?

18 A. Yes, I had a couple of  
19 girlfriends, but they didn't stay for  
20 very long.

21 Q. We are here about your  
22 daughter, Megan Larrick?

23 A. Yes.

24 Q. And my condolences to you and  
25 the rest of your family for her passing.

1                   When did you first find out  
2   that Megan Larrick had passed away?

3           A.     The day after.

4           Q.     And that would have been what  
5   day, May 10th?

6           A.     Probably.

7           Q.     2019?

8           A.     Yeah.

9           Q.     And how did you find that out?

10          A.     My brother-in-law called me.

11          Q.     And what was his name?

12          A.     Keith Langler.

13          Q.     And what did he tell you?

14          A.     He told me that my daughter  
15   passed away in Tuscarawas jail.

16          Q.     After you found out that your  
17   daughter passed away in the Tuscarawas  
18   County jail, did you contact the  
19   sheriff's department to find out what  
20   happened?

21          A.     No, he come and picked me up.  
22   I was out of town. I was in Lore City,  
23   Ohio when I found out and he come and  
24   picked me up.

25          Q.     You're talking about your

1 brother-in-law?

2 A. Yes.

3 Q. So the question was did you  
4 talk to anybody at the sheriff's office  
5 after your daughter died --

6 A. No.

7 Q. -- to find out what happened?

8 A. No, I didn't.

9 Q. Since your daughter died, have  
10 you spoken with anybody in the sheriff's  
11 department about what happened?

12 A. No, sir.

13 Q. And Serena Larrick is your  
14 ex-wife?

15 A. Yes, sir.

16 Q. When were you divorced from  
17 Serena Larrick?

18 A. Oh, I really -- I really don't  
19 remember.

20 Q. It's been a while?

21 A. Been a while, yeah.

22 Q. Okay. And how old was Megan  
23 when you got divorced from Serena  
24 Larrick?

25 A. I can't honestly answer that.

1 Q. Do you know how old Serena was  
2 when she passed away?

3 A. Maybe 44. I'm really -- I  
4 don't even know how old she is actually.

5 Q. Do you know how old Megan was  
6 when she passed away?

7 A. She was 21 I think.

8 Q. And do you know where Megan  
9 was living at the time of her death?

10 A. I heard it was here, but I  
11 didn't know exactly where, in Noble  
12 County, Pleasant City. I mean --

13 Q. In New Philly?

14 A. New Philly, yeah.

15 Q. But you didn't know the  
16 address?

17 A. No, sir.

18 Q. Had you ever visited at her  
19 home in New Philadelphia?

20 A. No.

21 Q. She has a child. Do you know  
22 the child's name?

23 A. Yes, Aniyah Rain Larrick.

24 Q. And that's A-N-I-Y-A-H I  
25 think?

1 A. I think so.

2 Q. Had you ever visited Megan and  
3 her daughter in New Philadelphia, maybe  
4 not in her house, did you ever travel up  
5 here to see your granddaughter Aniyah?

6 A. I would go to my ex-wife's  
7 like on birthdays and stuff like that.

8 Q. Okay.

9 A. I went to her house one time.  
10 It was after she had passed, Megan's.

11 Q. Have you had an opportunity to  
12 the see Aniyah since Megan passed away?

13 A. Yes, I get her quite often,  
14 take her to my mother's and keep her on  
15 the weekends sometimes. I just seen her  
16 10 minutes ago.

17 Q. Oh.

18 A. 20 minutes ago.

19 Q. Okay. You mentioned you  
20 thought Serena had turned off your phone  
21 before you got here?

22 A. Yes, I did.

23 Q. And so I assume Serena brought  
24 you here?

25 A. She come to pick me up last

1 night so I could make it here, you know,  
2 I don't drive, so I could be here today.

3 Q. Were you present in Cambridge  
4 when the Cambridge police arrested Megan  
5 Larrick on May 8, 2019?

6 A. No, sir, I wasn't.

7 Q. Where were you?

8 A. Lore City, Ohio.

9 Q. Did you know that your  
10 daughter Megan was staying at your place  
11 on May 8, 2019?

12 A. No, I didn't. She had her  
13 apartment at that time.

14 Q. The apartment in New Philly?

15 A. Yes, sir.

16 Q. At some time on May 8, did you  
17 find out that the police had arrested  
18 Megan?

19 A. I didn't find out nothing  
20 until the next day when my brother-in-law  
21 come to pick me up from Lore City.

22 Q. Did you have a phone at the  
23 time?

24 A. I think I did.

25 Q. Okay.

1           A.       But my buddy that I was  
2 staying with had one. They tracked me  
3 down.

4           Q.       How long had you been away  
5 from your home on May 8th?

6           A.       Just -- I left that day. The  
7 day she was arrested, I had left before  
8 that.

9           Q.       Okay. What time did you  
10 leave?

11          A.       I have no clue.

12          Q.       And did you see her, did you  
13 see Megan Larrick before you left on May  
14 8, 2019?

15          A.       I think I did. I mean, I was  
16 highly intoxicated the like two, three  
17 days before that and that day. I don't  
18 really remember much at all.

19          Q.       Was anybody else staying at  
20 your place on May 8, 2019?

21          A.       I don't think -- not  
22 permanently, no.

23          Q.       Well, how about temporarily,  
24 anybody staying there?

25          A.       There was a girl hang -- a

1 woman hanging around there, Jenny Sloan,  
2 and I guess she was arrested the same  
3 time my daughter was.

4 Q. So Jennifer --

5 A. I don't know how long she had  
6 been there or, you know, if she spent the  
7 night or whatever.

8 Q. You don't recall?

9 A. No, I don't.

10 Q. But you do recall that  
11 Jennifer Sloan was hanging around your  
12 place on May 8, 2019?

13 A. Yes, yes, I do remember that.

14 Q. Do you know if Megan, on May 8  
15 or the day before that, before you left  
16 Cambridge, do you know if Megan was  
17 taking any drugs?

18 A. No, I don't.

19 Q. When you last saw Megan before  
20 you left Cambridge on May 8, do you know  
21 if Megan was high?

22 A. I had heard that she had been  
23 using, but I could never really tell.

24 Q. Well, before you left  
25 Cambridge on May 8 to go to Grove City --



1 A. Lore City, L-O-R-E, Lore City.

2 Q. Lore City?

3 A. Uh-huh.

4 Q. Okay. On May 8, 2019, before  
5 you left Cambridge for Lore City, you  
6 mentioned you saw Megan?

7 A. I saw her that day.

8 Q. Okay. And do you have an  
9 opinion as to whether or not she was  
10 high?

11 MS. BONHAM: Objection.

12 A. I was highly intoxicated  
13 myself, and even when I wasn't, I  
14 couldn't tell, so I did not know if she  
15 was or not.

16 Q. And did you see Megan using  
17 any drugs on May 8th, 2019 in your  
18 house --

19 A. No, sir.

20 Q. Wait until I finish with my  
21 question and then you can answer.

22 A. Oh, okay.

23 Q. Because it's hard for her to  
24 take down what both of us say at the same  
25 time. I think she could do it because

1 she's pretty good, but let's not make it  
2 too hard for her.

3 A. Oh, sorry. I didn't realize.

4 Q. Okay. So you indicated you  
5 were high or drunk on May 8 yourself?

6 A. Just drunk.

7 Q. Just drunk. Do you have a  
8 drinking problem?

9 A. Yes, sir.

10 Q. And you'd consider yourself an  
11 alcoholic?

12 A. Definitely.

13 Q. And what does that mean to  
14 you?

15 A. Dysfunctional, long periods of  
16 blackouts, jail cases, in and out of  
17 hospitals, jail, hospitals or death.

18 Q. How are you feeling today?

19 A. I feel pretty good.

20 Q. Did you have anything to drink  
21 today?

22 A. No, sir.

23 Q. Did you ever, prior to May 8,  
24 2019, talk to Megan about her drug use or  
25 alcohol use?

1           A.       She knows -- she knew I didn't  
2 like it, but she wouldn't admit it to me.

3           Q.       So did you speak to her about  
4 it?

5           A.       Yes.

6           Q.       And you expressed your  
7 displeasure about it?

8           A.       Yes, sir.

9           Q.       And I don't want to put words  
10 in your mouth. What was Megan's response  
11 to your saying you didn't like what you  
12 thought she was doing?

13          A.       She would be like, I'm trying  
14 not to, you know, trying to quit, and she  
15 was talking about getting in rehab and  
16 things like that.

17          Q.       Do you recall if she was at  
18 your house in Cambridge the day before  
19 you left for Lore City?

20          A.       No, I don't recall.

21          Q.       Okay. Were you at home in  
22 Cambridge when Serena Larrick says she  
23 came and picked up Megan's daughter?

24          A.       Serena said I was. I don't  
25 really remember.

1 Q. So you don't have any  
2 independent recollection of Serena taking  
3 Aniyah with her on May 8?

4 A. No, I don't.

5 Q. Had you ever heard that Megan  
6 would swallow baggies filled with drugs  
7 if she was confronted by the police?

8 A. I never knew she would do  
9 that.

10 Q. So correct me if I am wrong,  
11 you didn't realize or didn't know that  
12 your daughter Megan Larrick had been  
13 arrested on May 8, 2019, correct?

14 A. I did not know, correct.

15 Q. And you didn't know that the  
16 New Philadelphia police picked her up at  
17 the Guernsey County Sheriff's Office on  
18 May 8, 2019 to transport her to New  
19 Philadelphia?

20 A. No, sir, I didn't.

21 Q. And you didn't know or did you  
22 know that Megan Larrick had been admitted  
23 to the Tuscarawas County jail just after  
24 midnight on May 9, 2019?

25 A. No, sir, I didn't know that.

1 Q. Do you know if Serena tried to  
2 contact you about Megan on May 8 or May  
3 9, 2019?

4 A. No, she didn't. The only call  
5 I got was from my brother-in-law.

6 Q. And that was the call you got  
7 after to tell you that your daughter had  
8 passed away?

9 A. Yes, sir.

10 Q. Did you have any discussions  
11 with Serena after that telephone call  
12 about Megan Larrick and the manner in  
13 which she died?

14 A. No, sir, not that day I don't  
15 think I did.

16 Q. Have you ever in the last  
17 two-and-a-half, three years talked to  
18 Serena about Megan?

19 A. Yeah, we talk about it now.

20 Q. When was the last time you had  
21 a discussion about Megan?

22 A. About a half hour ago.

23 Q. And what did you talk about?

24 A. She was just talking about she  
25 didn't want to go here, have her

1 deposition because this is where Megan  
2 was, and she took me here. I didn't know  
3 where the place was at and things like  
4 that.

5 Q. Did you and Serena talk about  
6 what your testimony might be today?

7 A. Yeah, I told her that I'm  
8 probably not very credible because I  
9 don't really remember anything and she  
10 agreed.

11 Q. Do you know where Jennifer  
12 Sloan is today?

13 A. Yes, she's in Guernsey County  
14 jail.

15 Q. Has she ever talked to you,  
16 called you, discussed with you Megan's  
17 death?

18 A. No, sir.

19 Q. Has she ever indicated to you  
20 what happened when Megan got arrested in  
21 Cambridge on May 8, 2019?

22 A. Yes, she did tell me that she  
23 was in the county jail with her and she  
24 wished she would have done more to help  
25 her because she was complaining about her

1 stomach and they didn't do much about it,  
2 but the only reason I know she's in jail  
3 is because I had talked to her mother and  
4 her mother told me. I don't have  
5 anything to do with her anymore. I  
6 haven't even really had much to do with  
7 her since that day.

8 Q. And she was actually staying  
9 at your place back then?

10 A. Anywhere she could, you know,  
11 she's like a street girl, woman I guess.

12 Q. What is your date of birth,  
13 sir?

14 A. 09-08-57.

15 Q. Just so we're clear, you have  
16 a son named Timothy Larrick, Jr., is that  
17 right?

18 A. Yes, sir.

19 Q. And is he Serena's child?

20 A. No, sir.

21 Q. And your son Timothy is having  
22 some legal problems right now?

23 A. Yes, sir. He was --

24 Q. Okay. I don't want --

25 A. He's in trouble.

1 Q. I just don't want to get --

2 A. Yes, sir.

3 Q. -- confused between you and  
4 him.

5 A. Yeah.

6 Q. Was he living with you down in  
7 Byesville at some time in the last year?

8 A. No, sir.

9 Q. Was he living somewhere else  
10 in Byesville?

11 A. He was staying with my  
12 granddaughter, but I don't know the  
13 address, but it was in Byesville in an  
14 apartment complex.

15 Q. And what's Jennifer Sloan's  
16 mother's name?

17 A. Melissa.

18 Q. Sloan?

19 A. I'm not really sure.

20 Q. Okay. Were you questioned at  
21 all by any Tuscarawas County sheriff's  
22 department employees concerning the death  
23 of your daughter Megan Larrick?

24 A. No, sir.

25 Q. How did you get from Cambridge



1 to Lore City on May 8, 2019?

2 A. I can't really remember.

3 Q. Somebody would have driven  
4 you, right?

5 A. Yes, somebody had to. I'm not  
6 sure.

7 Q. Did you own a vehicle back  
8 then?

9 A. No, sir.

10 Q. Do you recall how Megan got to  
11 your house in Cambridge on May 8, 2019  
12 with her daughter?

13 A. I know she -- my brother  
14 bought her a car. She had her license  
15 and I would say she drove.

16 Q. You're just guessing about  
17 that though, is that right?

18 A. Yes, sir.

19 Q. Or do you have a clear  
20 recollection of her driving up to your  
21 house?

22 A. No, sir, I don't.

23 Q. Do you have any clear  
24 recollection of visiting with your  
25 granddaughter Aniyah on May 8, 2019?

1 A. No, sir.

2 Q. Do you recall any discussions  
3 you had with Megan Larrick on May 8, 2019  
4 when she was at your place?

5 A. No, sir.

6 Q. Do you know a guy named Albert  
7 Raymond Correlly?

8 A. Yes, sir.

9 Q. Who is he?

10 A. Just some thief that runs  
11 around stealing.

12 Q. Do you know if he stayed at  
13 your place in Cambridge at any time?

14 A. I hope he didn't. Not that I  
15 -- I didn't really like the guy so, but I  
16 don't think he did.

17 Q. Do you know that on May 10,  
18 2019 when Jeff Moore of the Tuscarawas  
19 County Sheriff's Department went to your  
20 residence at 230 North 6th Street in  
21 Cambridge, that Mr. Correlly answered the  
22 door?

23 A. No, I didn't know that.

24 Q. Do you know a guy named Trig  
25 or Trigger?

1 A. No, sir.

2 Q. Did you ever see Megan buying  
3 any drugs?

4 A. No, sir.

5 Q. Did you ever see Megan using  
6 any drugs at your house at any time  
7 before May 9, 2019?

8 A. No, sir. No, they hid that  
9 stuff from me.

10 Q. So you're not sure if she took  
11 drugs, is that what you're telling me?

12 A. I had heard it and she got  
13 caught one time with a pipe under --  
14 somebody got caught with one under his  
15 car seat and she was there. I knew it,  
16 but she didn't do it around me because I  
17 don't like it.

18 Q. Prior to May 9, 2019, did you  
19 have any discussions with Serena Larrick  
20 about Megan's drug use?

21 A. No, sir.

22 Q. Did you have any discussions  
23 with Serena Larrick, prior to May 9,  
24 2019, concerning Megan Larrick staying at  
25 your place?

1 A. No, sir.

2 Q. Did Serena ever indicate to  
3 you that she didn't like Serena and  
4 Aniyah staying at your house in  
5 Cambridge?

6 MS. BONHAM: Objection.

7 A. I don't think Aniyah ever  
8 stayed at my house in Cambridge. I  
9 always visited her at my mother's.

10 Q. I may have asked you this  
11 question already. Do you recall Megan  
12 Larrick your daughter being at your house  
13 the day before you left for Lore City on  
14 May 8, 2019?

15 A. Vaguely. I don't even think I  
16 remember even seeing her.

17 Q. Do you recall --

18 A. I mean, everything run  
19 together and I was drunk and I can't  
20 really honestly say if I did or if I  
21 didn't.

22 Q. Okay. That's what I'm asking  
23 you for.

24 A. Yes, sir.

25 Q. To be honest.

1           A.     I tried to think, you know,  
2     about it, but I can't really recall.

3           Q.     Do you think you have a memory  
4     problem due to your alcohol use and abuse  
5     over the years?

6           A.     Yes, I do.

7           Q.     When was the last time you  
8     held a full-time job?

9           A.     20 years, 30 years ago maybe.

10          Q.     And what did you do back then?

11          A.     I worked in oil rigs when I  
12     was young with my first wife.

13          Q.     You're going to have to run  
14     that by me again. What was that?

15          A.     Oil rigs.

16          Q.     Oh, oil rigs?

17          A.     That's the only job that I  
18     ever had that I stuck with very long.

19          Q.     When was the last time you had  
20     any employment?

21          A.     20 years ago maybe.

22          Q.     You haven't worked in 20  
23     years?

24          A.     No, sir.

25          Q.     How do you get along?

1           A.     I got a pension from the  
2 military. I got hurt in the marine  
3 corps. I get a small pension from there.

4           Q.     When did you serve in the  
5 marines, sir?

6           A.     From '76 to '78.

7           Q.     What injury did you suffer  
8 from the marines?

9           A.     I had a broken hip, broken  
10 pelvis, dislocated shoulder.

11          Q.     How did that happen?

12          A.     I got knocked off a pier in  
13 Genoa, Italy.

14          Q.     And did you get a medical  
15 discharge?

16          A.     No, I got a general under  
17 honorable. I get -- I get a full -- I  
18 was getting 40% and then I got SSI and  
19 they dropped it down to 20%. Then now I  
20 get Social Security, so I get three  
21 checks a month.

22          Q.     So you get Social Security  
23 SSI?

24          A.     I get VA, SSI, and regular  
25 Social Security for my age.

1 Q. How old are you?

2 A. 65.

3 Q. Are you seeing any kind of  
4 doctor for memory issues?

5 A. No, sir.

6 Q. And are you involved in any  
7 ongoing attempts to treat your alcohol  
8 addiction?

9 A. No, sir. I just cut down  
10 slowly myself.

11 Q. When was the last time you had  
12 a drink, sir?

13 A. Yesterday.

14 Q. Do you know if Albert Correlly  
15 is married?

16 A. He has a woman, but I don't  
17 know if he's married.

18 Q. Okay. Is her name Christina?

19 A. Yes.

20 Q. Give me a minute.

21 Who is Matthew Larrick?

22 A. My youngest son.

23 Q. And that is Megan's brother,  
24 is that right?

25 A. Yes, sir.

1 Q. Do you know how old Matthew  
2 is?

3 A. He's 22.

4 Q. When was the last time you had  
5 any contact with Matthew Larrick?

6 A. Yesterday.

7 Q. How about before that?

8 A. The day before.

9 Q. Does he live around you in  
10 Byesville?

11 A. Yes, he does.

12 Q. Do you recall where your  
13 daughter Megan went to high school?

14 A. Cambridge and Buckeye Trail --  
15 I mean Meadowbrook. I think that was it.

16 Q. Do you know if Megan had any  
17 physical ailments?

18 A. Just she was missing one eye.

19 Q. And how did that happen?

20 A. She had a tumor behind her eye  
21 and it ripped her retina when she was  
22 three years old.

23 Q. And at that time were you  
24 still married to Serena?

25 A. Yes.



1 Q. Do you know how old Aniyah is?

2 A. She's four.

3 Q. Did you ever have any  
4 discussion with Serena Larrick about  
5 Megan swallowing baggies or balloons  
6 filled with drugs?

7 A. No, sir.

8 Q. That would be before or after  
9 she died. Did you ever have any  
10 discussion about that?

11 A. No, sir.

12 Q. Okay. I'll begin this  
13 questioning by telling you my son, one  
14 son has a long-time drug addiction, so I  
15 don't mean any offense in asking you  
16 these questions.

17 When did you first become  
18 aware that Megan was using drugs, if you  
19 were?

20 A. I really couldn't, you know, I  
21 never seen her do it, so I just got to go  
22 by hearsay, so I don't know. She was  
23 probably young. I mean, probably in  
24 school. I really don't know.

25 Q. Okay. I'm just asking you

1     that because as a father, I didn't know  
2     for a long time.

3           A.     Yeah, they tend to hide that  
4     from people that doesn't want them doing  
5     it, you know, obviously.

6           Q.     Okay. So you felt that she  
7     was hiding that from you, if in fact she  
8     was taking drugs?

9           A.     If she was, yes, she was  
10    hiding it.

11          Q.     Okay.

12          A.     You know, I can't really say  
13    because I never seen her do it.

14          Q.     And you testified before you  
15    couldn't really tell if she was high or  
16    not?

17          A.     No, I don't understand it too  
18    much because it's not my drug of choice.

19          Q.     What did you hear she was  
20    using?

21          A.     Meth because my oldest son was  
22    doing it and I think he -- some people --  
23    he's the one that got her started on it.

24          Q.     And that would be who?

25          A.     Timothy.

1 Q. Okay.

2 A. But then again, you know, he's  
3 not going to admit it so...

4 Q. You are just hearing all this  
5 stuff third-hand, right?

6 A. Yeah, yeah.

7 Q. I know what you're talking  
8 about. You say you're staying with your  
9 mother in Byesville?

10 A. I take care of her off and on.  
11 I have a permanent address in Noble  
12 County -- not Noble, but Pleasant City,  
13 and I'm working -- my nephew is helping  
14 me fix it up and it's not really exactly  
15 livable right now, but I'm back and forth  
16 and I stay with my mother anyway no  
17 matter what house I get because she's 83,  
18 and so permanent address in Pleasant City  
19 and then I stay with my mom periodically.

20 Q. Okay. And your mom, do you  
21 know if she talked to Megan at all back  
22 in May of 2019?

23 A. Yes, she was always at my  
24 mother's helping, cleaning and stuff like  
25 that.

1 Q. And have you ever discussed  
2 with your mother what happened to Megan,  
3 how she died?

4 A. She knows.

5 Q. And has she ever indicated  
6 that Megan tried to call her on May 8  
7 when she got arrested?

8 A. She may have. I don't recall.

9 Q. Okay. But you don't know, you  
10 don't remember?

11 A. I don't know. No, I don't  
12 know if she did or not.

13 Q. You don't have any  
14 recollection of your mother saying hey,  
15 Megan called me from the county jail?

16 A. No, sir.

17 Q. Did you ever have any  
18 discussions with Serena about Megan  
19 trying to get a hold of her on May 8,  
20 2019 after Megan got arrested?

21 A. No.

22 Q. Okay.

23 A. I really don't talk about it  
24 unless I have to.

25 Q. Like today?

1 A. Like today.

2 Q. But you did talk with Serena  
3 about it before you came here today?

4 A. Yes.

5 Q. And has Serena ever, including  
6 today, said gee, I wish I would have  
7 picked up the phone when Megan called me?

8 A. No, she never said that.

9 MS. BONHAM: Objection.

10 Q. Prior to May 8, 2019, were you  
11 concerned about Megan's ability to take  
12 care of her daughter?

13 A. No, sir.

14 Q. Do you know if Serena was  
15 concerned about Megan's ability to take  
16 care of her daughter on or about May 8,  
17 2019?

18 A. No, sir.

19 Q. Did Serena ever have any  
20 conversations with you, prior to May 8,  
21 2019, about getting custody of Aniyah?

22 A. No, sir.

23 Q. Do you recall if anybody  
24 besides Jennifer Sloan was staying at  
25 your place in the week before May 8,

1 2019?

2 A. I don't think Jennifer was. I  
3 think my son was, Timothy. Jennifer  
4 never stayed at my house full-time. She  
5 was just like a drifter type.

6 Q. So your son Timothy would drop  
7 by from time to time, is that right?

8 A. He would -- yeah, he was there  
9 a lot.

10 Q. Okay.

11 A. I had a big house, you know,  
12 he had a room upstairs. He was just in  
13 and out.

14 Q. Did Megan have a room in your  
15 house?

16 A. She did when she was going to  
17 high school. They stayed with me one  
18 year, my two kids with Serena, but she  
19 had her own place.

20 Q. Back on May 8, 2019, do you  
21 recall if the Cambridge police came to  
22 your house?

23 A. No, I don't.

24 Q. And before you left for Lore  
25 City, did any lawn enforcement people

1     come to your house on May 8?

2           A.     No, not that I know.

3           Q.     Before May 8, 2019, do you  
4     have any recollection as to how often  
5     Megan came over to your place in  
6     Cambridge?

7           A.     No, sir.

8           Q.     Did you see her often back  
9     then?

10          A.     Yes, but not always there.  
11     Like I said, I'd be in Byesville or she'd  
12     come down to my mother's house and she'd  
13     bring the baby. I didn't really like her  
14     bringing my granddaughter in that  
15     environment, down and around that street.

16          Q.     Well, tell me about the  
17     environment.

18          A.     People across the street  
19     fighting, drugs everywhere, different  
20     houses, fights. It was kind of rough, so  
21     I didn't really like her being there.

22          Q.     Okay. So in Byesville, when  
23     you would visit your mother and Megan was  
24     there, did you recognize at any time that  
25     Megan was doing drugs?

1 A. No, sir.

2 Q. When you saw her at those  
3 times prior to May 8, 2019 at your  
4 mother's place, Megan acted normally?

5 A. Yes, sir.

6 Q. And if she was on drugs or  
7 taking drugs, you didn't realize it, is  
8 that right?

9 A. I didn't think so. My mom  
10 does not deal with that, even smoking  
11 cigarettes in the house. No, she didn't  
12 look, you know, abnormal in any way.  
13 Just cleaning and taking care of the baby  
14 and normal things.

15 Q. When you would see Megan at  
16 your mother's house with Aniyah, you  
17 thought that Megan was taking good care  
18 of her daughter, right?

19 A. Obviously, yes, sir, because  
20 she was.

21 Q. And at that time, you never  
22 had any conversations with Serena about  
23 Megan's inability to take care of her  
24 daughter?

25 A. No, sir.



1 Q. Did you have any discussions  
2 with your mother about Megan's inability  
3 to take care of Aniyah?

4 A. No, we seen no problems like  
5 that.

6 Q. I know we're going back a few  
7 years, but do you recall how often you'd  
8 see Megan over at your mom's house back  
9 in 2019 spring?

10 A. She would come over and spend  
11 the weekends usually with my mother, just  
12 like I still do, you know, just --

13 Q. So Megan was --

14 A. She never stayed away from my  
15 mother too much, too long.

16 Q. I'm sorry?

17 A. She never stayed away from my  
18 mother very long, you know, she'd bring  
19 the baby and she had a room there she  
20 could just --

21 Q. And so she would stay with  
22 your mother?

23 A. On the weekend a lot of times.

24 Q. On the weekend?

25 A. At lot of times, keep the baby

1     there.

2           Q.     And that's when you would go  
3     over and see your mother, right?

4           A.     I would already be there.

5           Q.     You would always be there?

6           A.     Yes.

7           Q.     So before her death, you had a  
8     lot of contact with Megan on weekends  
9     then?

10          A.     Yes.

11          Q.     Okay.

12          A.     Sometimes during the week  
13     she'd stop in. After Megan passed, I left  
14     that house down there. I didn't hardly  
15     go back, and when I did go back, there  
16     was nothing hardly left and it was  
17     stolen. I was going to give the house to  
18     the city, but I kind of snapped out of it  
19     and sold it.

20          Q.     Are you talking about the  
21     house in Cambridge?

22          A.     Yeah.

23          Q.     Okay. So you sold that house  
24     in Cambridge?

25          A.     Uh-huh.

1 Q. Did you ever have any  
2 discussions with Megan about any problems  
3 with the law Megan may have had prior to  
4 her death?

5 A. Yes, she had a couple of  
6 traffic tickets here in this county.

7 Q. You mean in Tuscarawas County?

8 A. Yes, sir.

9 Q. New Philadelphia?

10 A. Uh-huh. I was talking to her  
11 about that and minor, you know, things  
12 like that.

13 Q. You're not aware of any other  
14 problems she was having with legal  
15 difficulties or the law?

16 A. No, sir.

17 Q. Did Megan ever tell you she  
18 was going to Narcotics Anonymous?

19 A. Yes, she did say she was  
20 wanting to go to treatment and stuff, but  
21 it was --

22 Q. Did she ask you to go through  
23 treatment?

24 A. No, I've been through  
25 treatment through the VA several times.

1 She never asked me. She said she wanted  
2 to do it.

3 Q. Okay.

4 A. But it was right towards the  
5 end when it was basically too late.

6 Q. I don't have any other  
7 questions. These other lawyers might.

8 EXAMINATION OF TIMOTHY LARRICK  
9 BY MR. CLEARY:

10 Q. Mr. Larrick, I think that  
11 you've been very truthful today to the  
12 extent that you are able to remember. I  
13 think you are a very credible person. I  
14 think that you've been very  
15 straightforward with us and I think that  
16 the questions that have been asked of you  
17 today are questions that parents wouldn't  
18 want to have to answer about their child,  
19 particularly a child who has passed.

20 I am interested in knowing  
21 just a little bit about the phrase that  
22 you've used that you didn't really  
23 "approve" of drugs?

24 A. No.

25 Q. Because it's not your

1 "choice"?

2 A. True, I don't really approve  
3 of drinking either. I'm just caught up  
4 in it, but, you know, like I said, when  
5 we go to my mother's house, there's no  
6 drinking, no smoking, you know, my people  
7 is really not like that. I just kind of  
8 ended up that way.

9 Q. I see. And so I think that  
10 what you have said is if there was any  
11 use of other than simple drinking, Megan  
12 didn't want that to be known by you  
13 because you would speak up?

14 A. Yes.

15 Q. And you would say I don't  
16 approve of that?

17 A. Exactly.

18 Q. And what was the reason that  
19 you would say I don't approve of that?

20 A. Because I've seen what it does  
21 to people. I've been in and out of  
22 treatments in the VA. I know what  
23 happens, like I said, jail, institutions  
24 or death. That's where it takes you or  
25 where you go. Even an alcoholic,

1 especially alcoholic, drug addict,  
2 sometimes quicker.

3 Q. I understand. Thank you, sir.  
4 I have no further questions today.

5 MR. CLEARY: Ms. Bonham?

6 MR. LANG: Ms. Bonham may  
7 have some questions though.

8 MR. CLEARY: Any questions?

9 MR. LANG: And might I say  
10 that we have stipulated that  
11 Elizabeth Bonham may attend the  
12 deposition by Zoom.

13 MR. CLEARY: I don't know how  
14 that happened, but yes.

15 MR. LANG: And we're okay  
16 with that.

17 MS. BONHAM: Thank you.

18 MR. LANG: And you're okay  
19 with that, Mr. Larrick, aren't you?

20 THE WITNESS: Yes, sir.

21 MR. LANG: Okay.

22 MS. BONHAM: Thanks everybody,  
23 and it's not a videorecorded depo.  
24 I'm just here on the video, is that  
25 right?

1 MR. LANG: That's right.

2 MS. BONHAM: I don't have  
3 anything for Tim. Thanks a lot for  
4 being here.

5 MR. LANG: Okay.

6 MR. CLEARY: That's all then.

7 (Deposition was concluded at 12:00 p.m.)

8 (Signature reserved.)

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1 THE STATE OF ) SS:  
2 OHIO,  
3 COUNTY OF )  
4 CUYAHOGA.  
5

6 I, Margaret A. Trombetta, a Notary  
7 Public within and for the State of Ohio,  
8 duly commissioned and qualified, do hereby  
9 certify that TIMOTHY LARRICK, was first  
10 duly sworn to testify the truth, the whole  
11 truth and nothing but the truth in the  
12 cause aforesaid; that the testimony then  
13 given by him was by me reduced to stenotypy  
14 in the presence of said witness, afterwards  
15 transcribed on a computer/printer, and that  
16 the foregoing is a true and correct  
17 transcript of the testimony so given by him  
18 as aforesaid.

19 I do further certify that this  
20 deposition was taken at the time and place  
21 in the foregoing caption specified. I do  
22 further certify that I am not a relative,  
23 counsel or attorney of either party, or  
24 otherwise interested in the event of this  
25 action.



1           IN WITNESS WHEREOF, I have hereunto  
2       set my hand and affixed my seal of office  
3       at Cleveland, Ohio, on this 16th day of  
4       February 2023.

*Margaret Trombetta*

5           Margaret A. Trombetta, Notary Public  
6       within and for the State of Ohio  
7       My Commission expires May 8, 2026.

1 THE STATE OF )  
2 ) SS:  
3 COUNTY OF )  
4  
5

6 Before me, a Notary Public in and for  
7 said state and county, personally appeared  
8 the above-named TIMOTHY LARRICK, who  
9 acknowledged that he did sign the foregoing  
10 transcript and that the same is a true and  
11 correct transcript of the testimony so  
12 given.

13 IN TESTIMONY WHEREOF, I have hereunto  
14 affixed my name and official seal at  
15 this day of  
16 , 2023.  
17  
18  
19

20 TIMOTHY LARRICK  
21

22 Notary Public

23 My Commission expires:  
24  
25

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